

EXHIBIT 17

From: [Heather Derenski](#)
To: [James Hicks](#); [Christopher Furman](#)
Cc: [Kaily Watson](#); [Laura McKeon](#); [Wendy Morrow](#)
Subject: Re: Wright v. State Farm 2:23-cv-00179-JNW - Discovery
Date: Thursday, April 18, 2024 5:08:33 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Jim,

To the extent we don't receive all of the outstanding discovery documents we've been discussing since September, including the updated claim file and additional documents discussed during oral argument for our Motion to Compel, and the revised proposed Protective Order by this afternoon, we will need another Fed. R. Civ P. 26(f) conference.

Christopher committed to an "expedited production" of the "archived emails" on February 8th. You committed to me in Judge Whitehead's Courtroom they would be produced no later than EOB March 27th and a revised protective order in the days following. You also committed to producing an updated copy of the claim file, as directed by Judge Whitehead, and that it would be produced in the days following that hearing as well. It has been weeks and not a single document has been produced, nor any apparent effort to resolve the ongoing discovery issues. Rather, more excuses.

I agreed to the extension for oral arguments for our motion to compel out of respect for your medical needs. Christopher inferred the discovery is being managed by you, which is why we needed to delay. You are asserting your cooperation is delayed because Christopher is out of office.

Although I'm sympathetic to your unforeseen medical needs, the continued excuses and delays damage my client's ability to fairly conduct discovery. You work for a large national firm, there are two of you assigned to this case, and you have multiple support staff. Certainly, you have the resources and support to keep this moving forward.

We have been more than patient waiting on documents State Farm routinely produces in these cases. Many of these documents were due over 7 months ago.

To the extent the documents aren't produced as previously agreed and as noted above, including the revised proposed protective order, I will call you at 1pm on Friday to comply with Fed. R. Civ. P. 26(f) and 37(a). I fully intend to renew our motion to compel if your office and State Farm continue to obstruct discovery.

Best,

Heather

Heather Derenski | Attorney

CEDAR VIEW LAW, PLLC

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From: James Hicks <jhicks@sinarlaw.com>
Sent: Wednesday, April 17, 2024 8:08 PM
To: Heather Derenski <Heather@cedarviewlaw.com>; Christopher Furman <cfurman@sinarlaw.com>
Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Laura McKeon <lmckeon@sinarlaw.com>; Wendy Morrow <wmorrow@sinarlaw.com>
Subject: Re: Wright v. State Farm 2:23-cv-00179-JNW - Discovery

Hi Heather,

Thanks for your patience. We'll be producing the archive emails tomorrow morning, and I will get the revised PO to you by the end of the day. Talk to you tomorrow.

Jim

James D. Hicks
Partner
Sinars Slowikowski Tomaska LLC
2815 Elliott Avenue Suite 100
Seattle, Washington 98121
206-593-1164

From: James Hicks <jhicks@sinarlaw.com>
Sent: Monday, April 15, 2024 4:54 PM
To: Heather Derenski <Heather@cedarviewlaw.com>; Christopher Furman <cfurman@sinarlaw.com>
Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Laura McKeon <lmckeon@sinarlaw.com>; Wendy Morrow <wmorrow@sinarlaw.com>


Subject: RE: Wright v. State Farm 2:23-cv-00179-JNW - Discovery


Thanks, Heather.




James D. Hicks


Partner


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From: Heather Derenski <Heather@cedarviewlaw.com>

Sent: Monday, April 15, 2024 4:07 PM

To: James Hicks <jhicks@sinarslaw.com>; Christopher Furman <cfurman@sinarslaw.com>

Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Laura McKeon <lmckeon@sinarslaw.com>; Wendy Morrow <wmorrow@sinarslaw.com>

Subject: RE: Wright v. State Farm 2:23-cv-00179-JNW - Discovery

Jim,

Wednesday is fine, so long as you're providing the documents we've discussed.

Thank you,

Heather

Heather Derenski | Attorney

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From: James Hicks <jhicks@sinarlaw.com>

Sent: Monday, April 15, 2024 3:10 PM

To: Heather Derenski <Heather@cedarviewlaw.com>; Christopher Furman <cfurman@sinarlaw.com>

Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Laura McKeon <lmckeon@sinarlaw.com>; Wendy Morrow <wmorrow@sinarlaw.com>

Subject: RE: Wright v. State Farm 2:23-cv-00179-JNW - Discovery

Hi Heather,

Sorry for the delay. Unfortunately, Chris has been out on vacation, and now he's on emergency leave, so I'm going to have to handle this myself.


Let me see what we can do about producing documents and a revised PO by Wednesday, so we can have something to talk about. How does that sound?


Thanks,
Jim





James D. Hicks


Partner


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From: Heather Derenski <Heather@cedarviewlaw.com>

Sent: Friday, April 12, 2024 6:52 PM

To: James Hicks <jhicks@sinarslaw.com>; Christopher Furman <cfurman@sinarslaw.com>

Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Laura McKeon <lmckeon@sinarslaw.com>; Wendy Morrow <wmorrow@sinarslaw.com>

Subject: RE: Wright v. State Farm 2:23-cv-00179-JNW - Discovery

Counsel,

Please provide your availability for a FRCP 26(f) conference.

Heather

Heather Derenski | Attorney

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From: Heather Derenski
Sent: Thursday, April 4, 2024 5:50 PM
To: James Hicks <jhicks@sinarlaw.com>; Christopher Furman <cfurman@sinarlaw.com>
Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Laura McKeon <lmckeon@sinarlaw.com>; Wendy Morrow <wmorrow@sinarlaw.com>
Subject: Wright v. State Farm 2:23-cv-00179-JNW - Discovery

Counsel,

I'm following up on several of the outstanding issues regarding discovery in this case. First, please provide your proposed revised protective order pursuant to Judge Whitehead's feedback at our hearing last week as soon as possible. Based on your commitment during the hearing, I would have expected to receive a revised proposed Protective Order by now.

Also at that time, both before and after the hearing, you committed to providing my office with several of the responsive discovery documents by end of day Wednesday last week, with an agreement to supplement the additional documents as discussed by Judge Whitehead in the very near future. Some of these are documents you previously committed to producing "expeditiously" in early February. As a courtesy, I have waited a week to follow up on State Farm's production, which has not yet been received.

I have also not heard back from your office regarding the FRCP 30(b)(6) topics served on January 19th. We conferred on those topics on January 22nd and you agreed to provide a response "by Friday" of that week. Please provide your responses no later than April 12th.

I look forward to hearing from you.

Regards,

Heather

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